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SUBJECT: Application for amend to license DPR-23 re elimination of requirement for accelerated testing.

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Carolina Power & Light Company
Robinson Nuclear Plant
PO Box 790
Hartsville SC 29551

JUN 29 1994

Robinson File No.: 13510HA
Serial: RNP/94-1270

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT - ELIMINATION OF REQUIREMENT
FOR ACCELERATED TESTING

Gentlemen:

In accordance with 10 CFR 50.90, Carolina Power & Light Company (CP&L) hereby requests an amendment to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The amendment will delete the requirement to perform accelerated testing on the Safety Injection, Residual Heat Removal, and Containment Spray system components when one train of these components becomes inoperable. This request is similar to amendments approved for other plants, including Surry Units 1 and 2, and Maine Yankee by NRC letters dated March 2, 1992, and January 11, 1993, respectively.

Enclosure 1 provides an affidavit as required by 10 CFR 50.30(b).

Enclosure 2 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 3 details, in accordance with 10 CFR 50.91(a), the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 4 provides an environmental evaluation which demonstrates that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the amendment.

Enclosure 5 provides page change instructions for incorporating the proposed revisions.

Enclosure 6 provides the proposed TS pages.

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In accordance with 10 CFR 50.91(b), CP&L is providing the State of South Carolina with a copy of the proposed license amendment.

In order to allow time for procedure revision and orderly incorporation into copies of the TS, CP&L requests that the proposed amendments, once approved by the NRC, be issued such that implementation will occur within 60 days of issuance of the amendment.

Please refer any questions regarding this submittal to Mr. K. R. Jury at (803) 383-1363.

Very truly yours,



R. M. Krich
Manager - Regulatory Affairs

- c: Mr. Max K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP
Attorney General (SC)

Enclosures:

1. Affidavit
2. Basis for Change Request
3. 10 CFR 50.92 Evaluation
4. Environmental Considerations
5. Page Change Instructions
6. Technical Specification Pages

Affidavit

C. S. Hinnant, having been first duly sworn, did depose and say that the information contained in letter RNP/94-1270 is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

C. S. Hinnant

Deborah W. Martin

Notary (Seal)

My commission expires: 6/23/98

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BASIS FOR CHANGE REQUEST

Proposed Change

The proposed amendment will delete the requirement to perform accelerated testing on the Safety Injection, Residual Heat Removal, and Containment Spray system components when one train of these components becomes inoperable.

Basis

This request deals with the elimination of the surveillance requirements to demonstrate that other, similar, safety related components are operable when components are found, or made, inoperable. These surveillance requirements are referred to as accelerated testing requirements. The plant components affected by this proposed change are:

	<u>Component</u>	<u>Technical Specification</u>
a.	Safety Injection (SI) Pumps	3.3.1.2.b
b.	Residual Heat Removal (RHR) Pumps	3.3.1.2.c
c.	SI and RHR Flow Paths	3.3.1.2.e
d.	Containment Spray (CS) Pumps	3.3.2.2.a. and b.
e.	CS Flow Paths	3.3.2.2.c

This proposed amendment will revise the above TS to remove the requirement to demonstrate that a component which will remain available is operable prior to removing a similar component from service. It was formerly believed that testing of available components when redundant components were unavailable was the best way to ensure that they could meet their design function. However, concerns about component wear caused by test conditions, the potential for personnel errors during testing, and the fact that both trains are unavailable during testing, have resulted in changes to reduce the amount of testing when possible. The fact that one component becomes inoperable or is taken out of service is not alone reason to question the operability of related components. The cause for each condition of inoperability should be individually evaluated to identify generic implications, if any, and then determine whether testing of related components is warranted. Therefore, except for potential common mode equipment failures, accelerated testing is not necessary to assure operability of a component since routine testing is sufficient to assure a high level of reliability and availability.

The determination of a possible common mode failure will be evaluated using the Operational Work Permit (OWP) procedure as the criteria for establishing the need to test the redundant component. The component's Equipment Inoperable Report (EIR) will contain the signoff for this determination. The governing EIR also requires verification of the operational readiness of the redundant component(s).

Conclusions

The proposed amendment involves an enhancement to plant safety.

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10 CFR 50.92 EVALUATION

The NRC has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards determination. The bases for this determination are as follows:

Proposed Change

The proposed amendment will delete the requirement to perform accelerated testing on the Safety Injection, Residual Heat Removal, and Containment Spray system components when one train of these components becomes inoperable.

Basis

This change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment does not involve a significant increase in the probability of an accident previously evaluated because the availability of the subject components will not be reduced and the design and performance of the components are not being changed. The subject components are provided to mitigate the consequences of analyzed accidents; therefore their availability has no bearing on the probability of occurrence of these accidents.

The proposed amendment does not involve a significant increase in the consequences of an accident previously evaluated. This change deletes alternate train testing requirements which, if maintained, could result in loss of the safety function. Elimination of these requirements will serve to ensure that one train of safety equipment is always available to mitigate the consequences of an analyzed accident. The remaining surveillance requirements provide adequate assurance that the components will be operable when required. Therefore the consequences of previously evaluated accidents will not be increased.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated because these proposed changes do not introduce any new modes of operation or testing, and no physical changes are being made to the plant. Therefore no new or different kind of accident could be initiated by this amendment.
3. The proposed revisions do not involve a significant reduction in the margin of safety since the routine testing requirements that remain in the Technical Specifications provide adequate assurance that the components will be operable when needed. Since the elimination of this accelerated testing will decrease component wear and improve availability, the margin of safety should be increased. Since accelerated testing may still occur when component problems involve a potential common mode failure, margins of safety associated with the components' abilities to perform their design functions will not be affected. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

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ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides criteria for, and identification of, licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows:

Proposed Change

The proposed amendment will delete the requirement to perform accelerated testing on the Safety Injection, Residual Heat Removal, and Containment Spray system components when one train of these components becomes inoperable.

Basis

The change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in Enclosure 3, the proposed amendment does not involve a significant hazards consideration.
2. The proposed amendment does not result in a significant change in the types, or significant increase in the amounts, of any effluent that may be released offsite. The proposed amendment deletes the requirement to perform testing of certain accident mitigating equipment when the alternate train becomes inoperable. Deletion of the testing requirements do not involve effluents and, as such, the change can not affect the types or amounts of any effluent that may be released offsite.

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed amendment deletes the requirement to perform testing of certain accident mitigating equipment when the alternate train becomes inoperable. Deletion of the testing requirements may, in fact, reduce occupational exposure. Therefore, the amendment does not result in an increase in either individual or cumulative occupational radiation exposure.

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PAGE CHANGE INSTRUCTIONS

Removed Page	Inserted Page
3.3-3	3.3-3
3.3-4	3.3-4
3.3-6	3.3-6
3.3-10	3.3-10